



molly conger, communist degenerate @socialistdog... · Jul 26, 2018

oh god bless. chief brackney is talking big talk about their intelligence gathering ability. how they are monitoring social media. the example that she gives is that jason kessler was trending on twitter the other day.

5



24



Solidarity Cville

@SolidCville

Replying to @socialistdogmom

but failing to gather intelligence from anarchists at city council who, to her befuddlement, **don't talk to the police**

7:38 PM · Jul 26, 2018 · Twitter Web Client

6 Likes

q.



TorchAntifaNetwork

@TorchAntifa

Reminder that if you post pictures of antifascists this weekend, please blur/obscure faces! its easy to add a cute sticker or emoji 🏠

6:31 PM · Aug 11, 2018 · Twitter Web Client

33 Retweets 115 Likes

r.



Generic Soy Milk
@EmilyGorcenski

Replying to @RichFelker @rory096 and @jxxf

Most importantly, you have to destroy the source image somehow. Posting any image can expose you to discovery of it if you were to be subpoenaed later on. Destroying the source ensures you can't accidentally expose someone later.

9:56 AM · Aug 12, 2018 · Twitter for iPhone

1 Retweet 4 Likes



Rory Stolzenberg @RoryStolzenberg · Aug 12, 2018

Replying to @EmilyGorcenski @RichFelker and @jxxf

Thanks for the advice, all. Dled pixlr and will purge phone on Monday.



Rory Stolzenberg @RoryStolzenberg · Aug 12, 2018

Replying to @EmilyGorcenski @RichFelker and @jxxf

Okay this is impossible to do in the moment, I'm just gonna only post pics of cops.



s.

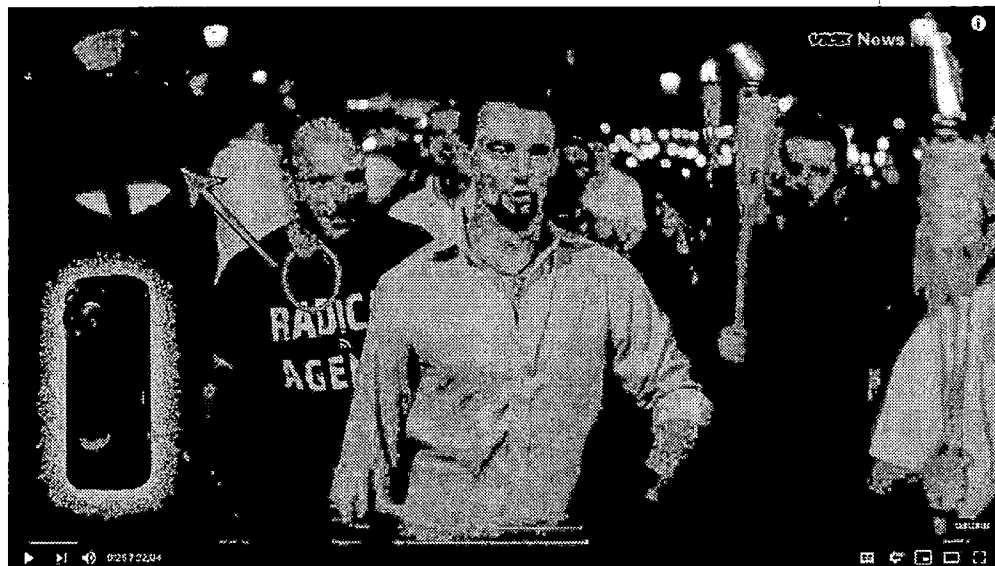
A Conspiracy, By Whom?

148. We are reminded throughout the complaint, that Plaintiffs allege a premeditated act of racial terrorism, meticulously planned by men who were previously complete strangers, and whose only bond to one another, is their seething, irrational, bloodthirsty hatred, of the unconditionally virtuous "other", who is clearly incapable of wrongdoing, no matter how many cameras record video of their crimes.

149. Surely, the Court needs no explanation from Defendant Cantwell on the workings of the criminal mind, but for the sake of lay observers, it warrants mention that people who are intent on carrying out premeditated racial terrorism, secretly planned months in advance, have little incentive for inviting law enforcement to bear witness to the plot's execution. Yet, inviting law enforcement is precisely what the Defendants, and Defendant Cantwell in particular, did. Plaintiffs' counsel have known this since at least May of 2018.

150. Nor do premeditated acts of racial terrorism tend to benefit from the presence of recording devices and hostile media outlets. Yet;

- a. In Paragraph 149, Plaintiffs note that Defendant Invictus spoke to a reporter
- b. In Paragraph 150, Plaintiffs note that Defendant Cantwell spoke to a reporter
- c. In Paragraph 152, Plaintiffs note that Defendant Spencer **invited** a reporter to UVA to **witness** the torchlit march
- d. In Paragraphs 158, and 185, Plaintiffs note that Defendant Invictus live streamed the torchlit march.
- e. In Paragraph 273, both Spencer and Cantwell follow up with reporters after the fact.
- f. Of all the text messages Cantwell exchanged during the weekend in question, **Plaintiffs have known for more than a year** that his most frequent contact was with Elle Reeve of Vice News.
- g. Cantwell wore the same body camera to the torchlit march that he did to the earlier meeting.



- h. Unfortunately, body camera footage of the torchlit march is missing, because the camera was lost after Plaintiffs' associates pepper sprayed Defendant Cantwell.



- i. Even after losing his body camera on the evening of August 11th, Cantwell knew video evidence would be important to fend off calumnies such as the one of which we now speak. That is why he brought a handheld camera with him to Lee Park on August 12th. That camera caught Plaintiffs' associate Mike Longo Jr. of Philadelphia pepper spraying Defendant Cantwell, for the second time in as many days, **unprovoked**, on his way to the park.
 - i. See Exhibit7-CantwellMacedFirstPerson.mp4, a video taken August 12th with this camera, which **Plaintiffs have had in their possession for more than a year.**
151. If the Plaintiffs' argument is taken seriously, then they seem to expect this court to believe an absolutely absurd combination of requisite assumptions.
- a. Plaintiffs allege that Defendants had the organizational capacity, and social capital, to bring hundreds of people, most of them complete strangers to one another, together for the purposes of committing premeditated acts of racially motivated terrorism.
 - b. Plaintiffs simultaneously allege that Defendants' ideology is mere "hate" and thus devoid of the substance or merit that might warrant large numbers of men to risk life, limb, and liberty by committing mass acts of violence in front of police and reporters.

- c. Plaintiffs simultaneously allege that Defendants were so lacking in intellectual capacity, that they thought this plot would somehow be aided by the presence of law enforcement and television cameras.

152. The police coordination, conflict avoidance strategies discussed at the August 11th planning meeting on the aforementioned video, and frequent communications with major media, were hardly the extent of the measures Defendants took to avoid the violence at the heart of this matter.

- a. Plaintiffs acknowledge in Paragraph 54 that Kessler applied for a permit
- b. When the city unlawfully tried to revoke the permit on August 7th, Kessler enlisted the help of the Rutherford Institute and the American Civil Liberties Union, to peacefully address the matter in Federal Court.
- c. They prevailed. See Exhibit34-KesslerACLU-Win.pdf
- d. On the August 11th meeting video that Plaintiffs' counsel have had for over a year, attendees can be heard celebrating when the announcement of the courtroom victory is made.
- e. Defendants tried to prevent Plaintiffs from knowing about their plans for the August 11th UVA torchlit march,

Capital of the Antifa

153. It would be charitable to say that Plaintiffs neglected to mention the most important detail of this case, but as we've just established, they are not deserving the benefit of the doubt. The Plaintiffs and their co-conspirators are adherents of violent and unpopular movements, and members of groups associated therewith. These memberships and adherences are obfuscated in this deception upon the Court, but prominently displayed elsewhere.

154. Plaintiffs describe Defendants in the most inflammatory terms possible. White Supremacist, neo-Nazi, "hate group", and other epithets are thrown around with reckless abandon, not at all dissimilarly to how Plaintiffs and their co-conspirators behave on social media. Plaintiffs intentionally ignore the terms Defendants identify themselves by, such as White Nationalist, or Alt Right.

- a. This is not erroneous, but rather, intentional. Polls show the terminology favored by Defendants polls better than the smears levied by Plaintiffs.

- i. See Exhibit104-UVAWNPoll.pdf
- ii. See Exhibit105-UVAREutersExtremePoll.pdf
- iii. See Exhibit106-ABCNaziPoll.pdf

155. Neither is it any accident that Plaintiffs deceptively claim to be mere concerned citizens, or members of innocuously named groups. Their association with violent and unpopular groups like Antifa, or Black Lives Matter, betray their true intentions, diminish public support for their crimes, and increase the difficulty of defrauding this Court.

a. In 2017, 2018, and 2019, polls showed little support and increasing opposition toward Antifa.

- i. See Exhibit107-RassAntifa17.pdf
- ii. See Exhibit108-RassAntifa18.pdf
- iii. See Exhibit109-RassAntifa19.pdf

b. In 2017, before the Events in dispute, a Harvard Harris poll showed 57% of Americans have a negative opinion of Black Lives Matter.

- i. See Exhibit1110-HHBLMPoll17.pdf

156. In fact, Plaintiffs are, or conspire with, Antifa adherents, for the purposes of politically motivated criminal violence.

a. Emily Gorcenski told the Charlottesville City Council “This is the Capital of the Antifa!” and the crowd went wild in celebration.

- i. See Exhibit28-CapitalOfAntifa.mp4

b. Plaintiff Wispelwey spoke to Slate.com about “battalions” of “antifa” armed with “community defense tools” to further their diversity of tactics.

- i. See Exhibit52-SethsBatallions.pdf
- ii. “I am a pastor in Charlottesville, and **antifa saved my life twice** on Saturday. Indeed, they saved **many lives from psychological and physical violence**—I believe the body count could have been much worse, as hard as that is to believe. Thankfully, we had **robust community defense** standing up to white supremacist violence this past weekend. Incredibly brave students held space at the University of Virginia and stared down a torch-lit mob

that vastly outnumbered them on Friday night. On Saturday, battalions of antifascist protesters came together on my city's streets to thwart the tide of men carrying weapons, shields, and Trump lags and sporting MAGA hats and Hitler salutes and waving Nazi flags and the pro-slavery "stars and bars."

- iii. "A phalanx of neo-Nazis shoved right through our human wall with 3-footwide wooden shields, screaming and spitting homophobic slurs and obscenities at us. It was then that **antifa stepped in** to thwart them. They have **their tools** to achieve their purposes, and they are not ones I will personally use, but **let me stress that our purposes were the same**: block this violent tide and do not let it take the pedestal."
- iv. "White supremacy is violence. **I didn't see any racial justice protesters with weapons; as for antifa, anything they brought I would only categorize as community defense tools and nothing more. Pretty much everyone I talk to agrees—including most clergy. My strong stance is that the weapon is and was white supremacy, and the white supremacists intentionally brought weapons to instigate violence.**"

The Radical Agenda Listeners' Meetup

- 157. Cantwell organized a meetup for listeners of the Radical Agenda show on the morning of August 11th 2017. This is the only event of that weekend which Cantwell can accurately be described as an organizer or leader of. Word of this meetup was mentioned twice on Cantwell's website.
- 158. The first mention was referenced in Plaintiffs Second Amended Complaint in Paragraph 106, referencing a blog post titled "Unite The Right Updates" which was posted on August 8th and updated on August 9th.
 - a. In this paragraph Plaintiffs stated "*Defendant Cantwell expressly "encourage[d]" Radical Agenda followers "to carry a concealed firearm."*"
 - b. See Exhibit24-UTR-Updates-Blogpost.pdf
 - c. Plaintiffs creative use of quotation marks evinces their fondness for deceiving this Court, and the extremely thin basis for their outlandish allegations.
 - d. Below, is a larger snippet from the August 9th update, to show the court how dishonest this was.

- i. *"The Daily Stormer has issued a call for people to show up, permit or none, and given some advise [sic] on what to bring and what not to bring. Their advice is to leave your firearms at home, and if you must bring a firearm, please conceal it.*

*Many of you have asked about meeting up with me personally. Since the main event is likely to be chaotic, we might have trouble catching up at the main event. I am working on coordinating a meetup for Radical Agenda listeners on Friday, but I have to be careful about how the details are announced. Sadly, anything I say to you here, I also say to the media, communists, and other criminal elements. **For this event, I encourage those with the legal authority, to carry a concealed firearm. Open carry will draw more unnecessary attention to us, so if you do not have a license to carry, please secure your firearms elsewhere and let us worry about defense.**"*

- e. Defendant Cantwell calls the Court's attention to his concern for obedience to the law, and warning to his audience against provocative, though perfectly legal, open carry displays of firearms at this event. Pertinent details conspicuously absent from the Plaintiffs' creative use of quotation marks.
- f. Also conspicuously absent is any mention that Cantwell was providing this advice to readers of his website for "this event" in reference to the Radical Agenda Listeners' Meetup, at which no violence ensued, despite the best efforts of Plaintiffs' co-conspirators.
- g. Plaintiffs' have attempted to materially deceive this Court by making the implication that Cantwell had encouraged "Radical Agenda followers" as opposed to "those with the legal authority" to conceal their firearms, at the events in dispute, rather than at a wholly separate event, at which no crime is alleged in the complaint.
- h. This "quote" was cited in Judge Moon's denial of Defendant Cantwell's motion to dismiss, when he stated "*He used his various platforms to 'advise[] rallygoers on bringing weapons.'*"
- i. This willful, and malicious, material deception perpetrated upon the Court, surely played a substantial role in Judge Moon's decision-making process, and potentially, the outcome of the motion to dismiss.
- j. **Plaintiffs had to know this would come out at trial, and perpetrated this deception so as to cost Defendant Cantwell the cost of attorneys'**

fees, time, emotional distress of this process, and especially to hinder his ability to participate in American political discourse.

159. Hoping to avoid the violence threatened by Plaintiffs and their co-conspirators, Cantwell only made the details of the meeting available to his paying customers, using his "paywall" feature. This feature restricts access to certain content on the website, based on a user name and password provided at the time of purchase, and was usually only to provide bonus content to paying customers.

160. To prevent Plaintiffs and their co-conspirators from signing up just to get the information, Cantwell disabled new signups before making the announcement.

161. As part of their premeditated conspiracy, Plaintiffs' and their co-conspirators paid for membership in advance of the Events in dispute.

a. Gorcenski falsely testified under oath at Cantwell's preliminary hearing on November 9th that, *"I found out about the Walmart meet up because Mr. Cantwell advertised the Walmart meet up on his own mailing list."*

b. The meetup was indeed announced via the email, but the details were behind the paywall. The email referenced can be seen as Exhibit113-RAMeetupEmail.pdf.

i. *"I'm in Charlottesville, Virginia for the Unite The Right Rally this coming Saturday. Since we have been meeting so much opposition from both the criminal elements and the municipal government alike, we've had to exercise a great deal of caution in terms of operational security. So I have temporarily disabled new membership signups, and made this post available only to existing paying members."*

I am in communication with a reporter who is covering the event, and wants exclusive access to a social gathering outside the main event. I've offered to provide exactly this in exchange for promotion of the Radical Agenda. I realize not all of you will want to be on camera or otherwise risk this kind of exposure, so I want us to meet up in their absence for a more intimate gathering. Then I will invite the reporter to come join us after those of you who wish to have had a chance to depart. I am working with the reporter on getting a signed agreement that they will not expose the faces or identities of anyone not explicitly offering to be exposed."



Paying members can find details for the meetup on ChristopherCantwell.com”

- c. A non-member who clicked through the link would have found a page similar to Exhibit114-RAMeetupNonMember.pdf, which cuts off the first paragraph, notifying the visitor that they must purchase membership to obtain access to the content.

- i. *“I am in communication with a reporter who is covering the event, and wants exclusive access to -*

To access this content, you must purchase Basic Membership...”

Radical Agenda Charlottesville Meetup

 August 10, 2017  Chris

I'm in Charlottesville, Virginia for the Unite The Right Rally this coming Saturday. Since we have been meeting so much opposition from both the criminal elements and the municipal government alike, we've had to exercise a great deal of caution in terms of operational security. So I have temporarily disabled new membership signups, and made this post available only to existing paying members. I am in communication with a reporter who is covering the event, and wants exclusive access to

-
- ☐ To access this content, you must purchase Basic Membership, Silver Membership, Gold Membership or Platinum Membership, or log in if you are a member.

Other people need to see this!



 Meetups, Members Only

- d. Only after logging in, as shown in Exhibit111-RAMeetupMember.pdf, does one see the details of the meeting.

- i. *“Let’s plan on meeting on Friday August 11th, in the Walmart parking lot at 975 Hilton Heights Rd, Charlottesville, VA 22901, at noon local time. We’ll all meet there, wait a half an hour or so for any stragglers, and then head off to our next destination.”*

162. Despite these security measures, Gorcenski announced the details of the meetup on Twitter the morning of the event.



Emily G (On the Babylonian Video Box) @EmilyGorcenski

It appears Chris Cantwell of Radical Agenda is holding a rally in the WalMart parking lot at noon before moving to an undisclosed spot.

8:51 AM - 11 Aug 2017

10 Retweets 18 Likes



2



10



18



Emily G (On the Babylonian Video Box) @EmilyGorcenski · 11 Aug 2017

Replying to @EmilyGorcenski

Cantwell is a headliner of UTR. Will you be there, @occdissent?



1



1



2



Emily G (On the Babylonian Video Box) @EmilyGorcenski · 11 Aug 2017

Cantwell runs Radical Agenda, which bills itself as "pro-European" (white supremacist) and promotes "common-sense extremism" (extremism).



2



5



16

a.

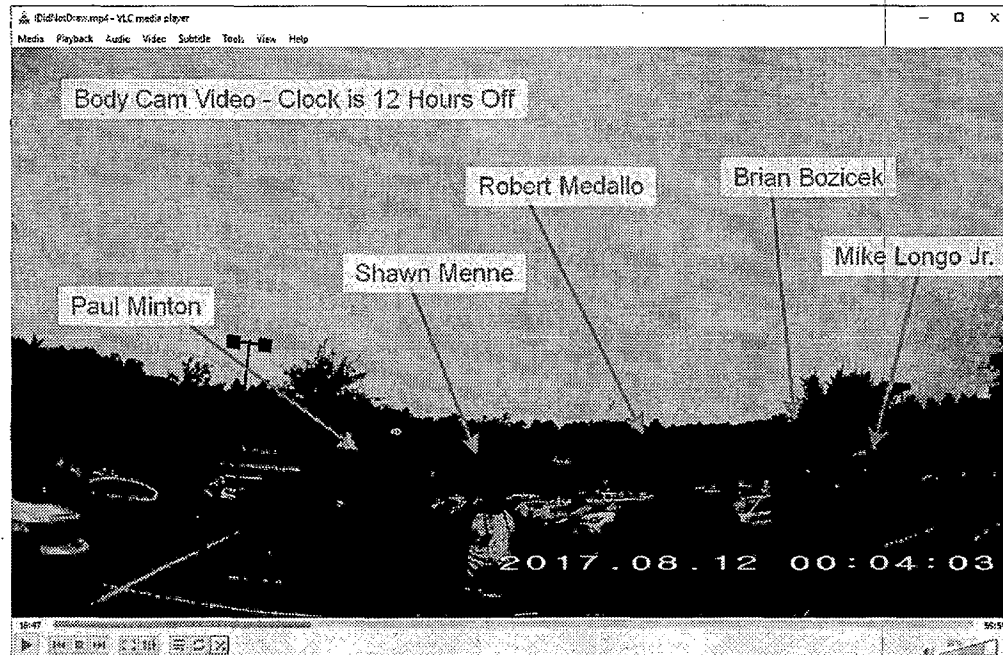
163. Gorcenski would later brag that Antifa "intel networks" had infiltrated Cantwell's website, and other communications networks to "disrupt" Defendants' activities.



a.

164. Cantwell wore a body camera throughout the event, and that video has been in the possession of Plaintiffs' counsel for more than a year. The video is under a confidentiality order to prevent Plaintiffs from using it for doxing, but relevant audio clips from the video are provided here as Exhibit116-WalmartAntifa.mp3 and Exhibit117-WalmartCops.mp3

165. The conspirators of the Plaintiffs who confronted Cantwell's group in the Walmart parking lot, were Antifa adherents from Philadelphia. Paul Minton, Mike Longo Jr., Brian Bozicek, Robert Medallo, and Shawn Menne.



a.

166. Cantwell can be heard on the video at 19 minutes and 20 seconds, specifically instructing his party not to engage the Antifa adherents. This can also be heard in Exhibit116-WalmartAntifa.mp3 at 1 minute and 20 seconds.
167. The Antifa adherents took photos and videos of Cantwell's associates, their vehicles, and their license plates. Then after a brief verbal altercation, captured in Exhibit116-WalmartAntifa.mp3, they left, and nobody in Cantwell's party made any effort to prevent them from leaving.
168. Despite this, Mike Longo Jr., and possibly others, phoned in a false report to police, claiming that Cantwell had drawn his weapon, racked the slide, and threatened the complainants' lives for being homosexual. This lie is disproven by the video.
169. Albemarle County Police confronted Cantwell in the parking lot, and informed him of the brandishing accusation. Cantwell informed the officers that he had a body camera running, and offered them the SD card from the camera to disprove the false allegation. Officers declined to take the SD card because they could not find their complainant, and sent Cantwell and his party on their way.
- a. Exhibit115-BrandishingNews.pdf is a contemporaneous news report about the incident.
- b. Exhibit116-WalmartCops.mp3 contains audio from Cantwell's body camera. Specifically, his interactions with Albemarle PD.

170. Gorcenski was in the parking lot during this interaction, and tweeted a photo of Cantwell talking to police officers, aware of the brandishing accusation.



Emily G (On the Babylonian Video Box) @EmilyGorcenski · 11 Aug 2017

Cantwell getting questioned by cops after allegedly brandishing a gun.



4 15 32



Kelly @GlitterBroker · 11 Aug 2017

That is the most pathetic "rally" I've ever seen.

2 6

Tweet unavailable

a.

171. Gorcenski would later contradict sworn testimony about this activity. In one instance, telling the FBI that information about the brandishing accusation was overheard from a nearby police car. In the other, Gorcenski testified at Cantwell's preliminary hearing that Gorcenski was in possession of a police scanner. The detail is important, because it provides further evidence of premeditation by Gorcenski, as well as an intent to deceive authorities.

a. Exhibit117-Gorcenski302.pdf is the FBI 302 report from Gorcenski's interview on October 25th.

i. *"She said she remained in her vehicle in the parking lot and observed the group of people from a distance. She said a short time later officers from the Albemarle County Police*

Department (ACPD) arrived, one of whom parked his police vehicle adjacent to hers. GORCENSKI said she was able to overhear the police radio from that vehicle when the officer called in an identification check on an individual whom she later determined was Cantwell. She said she could hear the radio traffic that identified Cantwell while the officer was talking to him."

- b. Exhibit15-CantwellPrelim.pdf is the transcript of Cantwell's preliminary hearing on November 9th.

i. *Q. And so you went down to Walmart, didn't you?*

A. Yes, that's what I testified to.

Q. And you just said you weren't involved.

A. I said that I observed from several rows away and that's a picture that I took from several rows away.

Q. And somehow you were able to publish on Twitter that he was getting questioned by cops, questioned by cops after allegedly brandishing a gun, isn't that right?

A. That is what I heard from the police scanner, yes.

172. Despite claiming not to know the people who confronted Cantwell's party, Gorcenski later described them as "We" and "Us" in livestream videos from UVA on the evening of August 11th. Gorcenski said "*We saw Christopher Cantwell have a rally today. Organized at the Walmart parking lot. We were there to capture that. The media showed up to capture that. We did not call in that, ah, brandishing the gun. That was a customer, inside the store. Which is proof that it is not just the "Antifa" that he is terrorizing, but actually the community in and of itself. We didn't need to do that, in fact, I got to that meetup a few minutes late*".

173. Gorcenski's tweet featuring Cantwell's picture, with the false accusation, was later featured on ItsGoingDown.org, along with information about the planned torchlit march through UVA.

a. See Exhibit31-IGDTorchMarch.pdf

b. "*Earlier today, a right-wing gathering at the local Walmart ended with Christopher Cantwell, a white nationalist speaker at Unite the Right who was once quoted as saying, "[L]et's fucking gas the kikes and have*

a race war," pulled a gun on a customer who confronted them in the parking lot. Police surrounded his followers within minutes but then allowed them to reconvene in McIntire Park.

This response from police is especially alarming. Fash are already prowling Charlottesville, with reports of churches being harassed. As IGD reported today, the right's leaders are documented calling for armed violence against anyone who crosses them.

It's beyond obvious that this is not about free speech but terrorism. Charlottesville's Black and brown folks must be protected at all costs, but the police don't seem to care.

Will UVA and its community take action to stand against white supremacist terrorism on campus? Will Charlottesville allow a torchlit rally to go down in city limits again?

174. As should be obvious from the above text, **this is war propaganda**. The false accusation by Plaintiffs' Philly Antifa co-conspirators, was passed on by Gorcenski, then reported as fact by IGD, and used as a pretext for the violence they had planned for later that evening at UVA. This concert of action directly led to the violence at UVA on August 11th.

175. The question "*Will Charlottesville allow a torchlit rally to go down in city limits again?*" would be answered affirmatively by any law-abiding person, but since Plaintiffs and their co-conspirators are criminals, anarchists, and terrorists, they had other plans.

176. The Heaphy report rightly identified this attempt to frame Cantwell for a crime as "the first hint of trouble on August 11th"

a. See Exhibit12-Heaphy.pdf - Page 112.

b. "*The first hint of trouble on August 11 occurred in the Wal-Mart parking lot on U.S. Route 29 in Albemarle County at approximately 12:00 p.m. Chris Cantwell, the host of a right wing podcast called the "Radical Agenda," told us that he arranged to meet with a number of paying customers at that location. Cantwell noted that he maintains a "pay wall" on his web site in order to protect information regarding his whereabouts from Antifa and other activist groups. Cantwell planned to meet his supporters, find a place to have lunch, and discuss plans for Saturday morning.*

When Cantwell and his supporters arrived, they were confronted by demonstrators. Emily Gorcenski was part of the group; she recalled

learning about the meeting through an "intel ring" that had infiltrated Cantwell's web site. Gorcenski drove to the Wal-Mart to take pictures, and she posted the pictures on Twitter. Within minutes, the Albemarle County Police Department received a report of a man with a firearm. When confronted by ACPD, Cantwell indicated that he had a permit to carry a concealed weapon but denied brandishing the firearm. ACPD declined to pursue charges, and Cantwell and his supporters departed."

- c. Gorcenski's statement to Heaphy, and public admission of the "intel networks" contradicts Gorcenski's sworn testimony of learning about the meetup through Cantwell's "mailing list".

- i. See Exhibit15-CantwellPrelim.pdf Page 185

- d. Gorcenski's admission to Heaphy about being "part of the group" that confronted Cantwell, also contradicts Gorcenski's sworn statement in the malicious prosecution lawsuit (see Exhibit119-GorcenskiMPAffidavit.pdf), and public statements denying any knowledge of, or association with, Philly Antifa.

Vice News – Take 1

177. After being cleared of any wrongdoing by Albemarle Police, Cantwell and his associates moved on to McIntire Park to meet with reporters from Vice News Tonight. The original plan, to go out for lunch, was canceled due to the false police report, and concerns the assailants would strike again.

178. The full unredacted audio of Cantwell's two interviews with Vice are available as Exhibit120-RA342.mp3 and have been publicly available on Cantwell's website as Episode 342 of the Radical Agenda since August 14th 2017.

179. In Paragraph 150 of Plaintiffs' Second Amended Complaint, Plaintiffs state "*On the morning of August 11, Cantwell and other co-conspirators gathered at a Walmart outside of Charlottesville. Cantwell then traveled to McIntyre Park to prepare for the evening. In an interview with a reporter from Vice, Cantwell said 'I'm trying to make myself more capable of violence ... I'm here to spread ideas, talk, in the hopes that somebody more capable will come along and do that'*"

- a. This "quote" is actually two parts of two completely different parts of an interview roughly 30 minutes apart from one another, and in no

way materially related to one another.

b. The first quote begins at the 33 minute mark of the audio.

- i. Cantwell, speaking of Black Lives Matter: *"I'm a guy who understands that there's problems with law enforcement as an institution, and I'm really interested in seeing those problems solved, but you can't solve them by distracting from the fact, by blaming it on race, and acting like cops are out hunting negros for sport. It's obnoxious!"*

And so, that started to make me realize, you know, there's a racial conflict going on. These people are starting riots, they're burning down pizzerias and pharmacies and blowing people's brains out at their protests, talking about they've got a first amendment right to do so. And I started to realize, you know, whatever problems I might have with my fellow White people, they generally are not included to such behavior, and you gotta kinda take that into consideration when you're thinking about out how to organize your society. "

Reeve: *"They're not inclined to such behavior?"*

Cantwell: *"The last time I saw a bunch of White people riot because an armed robber got shot? Been awhile, let's say."*

Reeve: *"I mean, Oklahoma City"*

Cantwell: *"Okay so exactly, you have to go back to Oklahoma City to talk about a White act of terrorism, right?"*

Reeve: *"Elliot Roger, Dylann Roof"*

Cantwell: *"Okay, so now you've managed to name three people, and I'm pretty sure Elliot Roger wasn't explicitly White by the way. But like, literally, you remember the names of White bombers and mass shooters. Okay? Can you tell me the names of all 19 hijackers on 9/11, off the top of your head? Of course you can't. You can't tell me the names of the last dozen people to blow themselves up in Europe. Because it happens all the time."*

You can remember Dylann Roof's name, you can remember Tim McVeigh's name"

Reeve: *"You were asking whether White people were capable of violence"*

Cantwell: *"I didn't say capable. Of course we're capable. I'm carrying a pistol. I go to the gym all the time. I'm trying to make myself more capable of violence. We conquered the entire planet. We built the most powerful militaries in the history of mankind. It's the inclinations and aptitudes, right? When White people want to kill people, they go and join the [expletive] military, right?"*

- c. Clearly, Defendant Cantwell is talking about a general capacity for violence in a wholly lawful sense. He references his licensed pistol, which he trains with at the firing range. He references his exercise regimen, which necessarily makes him a more formidable opponent in a physical altercation, try though he may to avoid them. He specifically references the wholly lawful example of joining the military, and in particular the well documented military prowess of majority White Nations, throughout the history of mankind.

- d. Roughly 30 minutes later, Cantwell says:

- i. Cantwell: *"I am not under the impression that I, personally, am going to save my Race & Nation. Okay? I'm here to spread ideas, talk, and frankly enjoy myself, in the hopes that somebody more capable will come along and do that. Somebody like Donald Trump, who does not give his daughter to a Jew"*

Reeve: *"So Donald Trump, but like, more racist"*

Cantwell: *"Yeah. More racist, a lot more racist than Donald Trump. I think that Donald Trump is telling the truth when he says 'I'm the least racist person around'. I don't think that you could feel about race the way I do, and watch that Kushner bastard walk around with that beautiful girl. Okay? So, yeah, I think somebody a lot more racist than Donald Trump, hopefully, you know, somebody with ten billion dollars in the bank decides*

to download the Radical Agenda, and I think you're going to see the world change, fast."

- e. On a completely different subject now, Cantwell is talking about someone like the President of the United States coming to power, who would thereby necessarily be far more capable than Defendant Cantwell, but is more in line with Cantwell's views than our current President. There is no violence here referenced, save for the coercive power inherent in any political entity.
- f. And of course, that is precisely why the Plaintiffs have abused this court. To shut Defendant Cantwell up, because this outcome is precisely what they are afraid of. Defendant Cantwell is an extraordinarily talented linguist, and if given the opportunity to fully participate in our discourse, he will impact the political outcomes in ways profoundly unfavorable to Plaintiffs.
- g. This blatant abuse of both punctuation and context is replete throughout this and countless other abuses of our Courts, and that they have been able to get away with it for two years, and counting, while Defendants are incarcerated, assaulted, bankrupted, slandered, and harassed, is a crime which our laws will need to be updated to address, if they are not sufficient to address it now.

180. Plaintiffs deceptively stripped context, and then pieced these two completely different subjects together for the purposes of maliciously and materially deceiving this Court, so as to cause the maximum possible harm to Defendant Cantwell.

- a. **This "quote" was cited in Judge Moon's denial of Defendant Cantwell's motion to dismiss, as he stated in his decision "*On the morning of the 11th, he told a reporter that he was 'trying to make [himself] more capable of violence.'*"**
- b. By materially deceiving this Court, Plaintiffs necessarily impacted Judge Moon's thought process, and potentially, the outcome of that decision.

181. This "quote" is oft cited, not only in this abuse of our Courts, but in Plaintiffs' fundraising efforts, and humorously, in their motion to enjoin.



a.

182. The willingness of Plaintiffs' financiers to deceive the public, for attention on social media, and financial gain, provides strong evidence of their ulterior motives for pursuing this lawsuit.

183. This "quote" being used as the strongest evidence of their conspiracy theory, also provides compelling evidence that the Plaintiffs never had any expectation of winning this suit. Plaintiffs and their counsel had to know this would be exposed at some point, and they have continued relying on this deception to date, only so they could obtain information through discovery, and inflict maximum damage on their critics and political opposition.

Interlude

184. After meeting with Vice, Cantwell went back to his hotel room to download the camera footage to his laptop.

185. After being notified by Kessler of the "leadership meeting" at McIntyre Park, Cantwell attended, as described at the beginning of this document.

186. After the meeting, Cantwell went back to his hotel room again, and downloaded the footage of the meeting to his laptop.

Videos of the Torch March

187. Defendants are fortunate to have an abundance of video evidence to prove their case. The sources of each are provided without edit, and from these, compilations are provided later to illustrate precisely what happened.

News2Share

188. News2Share is a YouTube channel run by an independent journalist by the name of Ford Fischer.

- a. A compilation of clips recorded from UVA on August 11th 2017 was published to YouTube by News2Share and is provided as Exhibit132-News2ShareA11.mp4

Augustus Invictus Live Stream

189. Defaulted Defendant Augustus Invictus live streamed the events of August 11th.

- a. The Invictus video is provided as Exhibit133-InvictusA11.mp4

"Raw and Uncut" Open Source Video

190. During the course of Cantwell's criminal defense investigation, a video titled "Raw and Uncut" of the August 11th UVA fight was downloaded.

- a. This video is provided as Exhibit134-RawAndUncut.mp4

Getty Images Video

191. Getty Images published a compilation of video from the August 11th UVA events.

- a. This video is provided as Exhibit135-Getty.mp4

"Insane New Footage" Open Source Video

192. Cantwell's criminal defense investigation also found a video titled "Insane New Footage" on a YouTube channel by the name of Jake Westley Anderson.

- a. This video is provided as Exhibit136-InsaneNewFootage.mp4

“Thinker at Areta” Open Source Video

193. A YouTube channel calling itself “Thinker at Areta” published a compilation video of the August 11th UVA events, which appears to be ripped from the livestream of Tim “Baked Alaska” Gionet. Gorcenski tweeted this video, describing it as the best depiction of his involvement that night.

- a. The Thinker at Areta video is provided as Exhibit137-ThinkerAtAreta.mp4

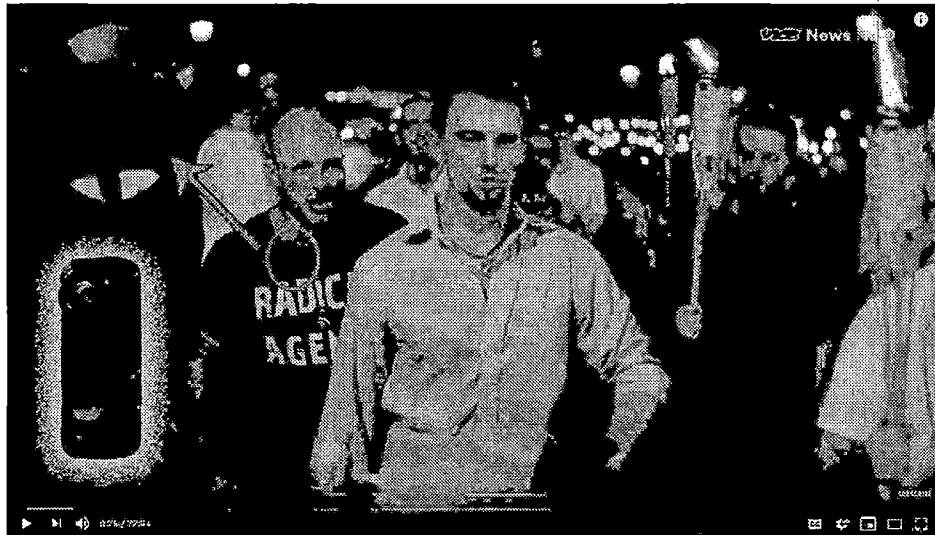
Unicorn Riot

194. Plaintiffs’ co-conspirator Unicorn Riot published heavily edited video of the August 11th events at UVA.

- a. This video is provided as Exhibit138-UnicornRiotA11.mp4

Cantwell’s Body Camera

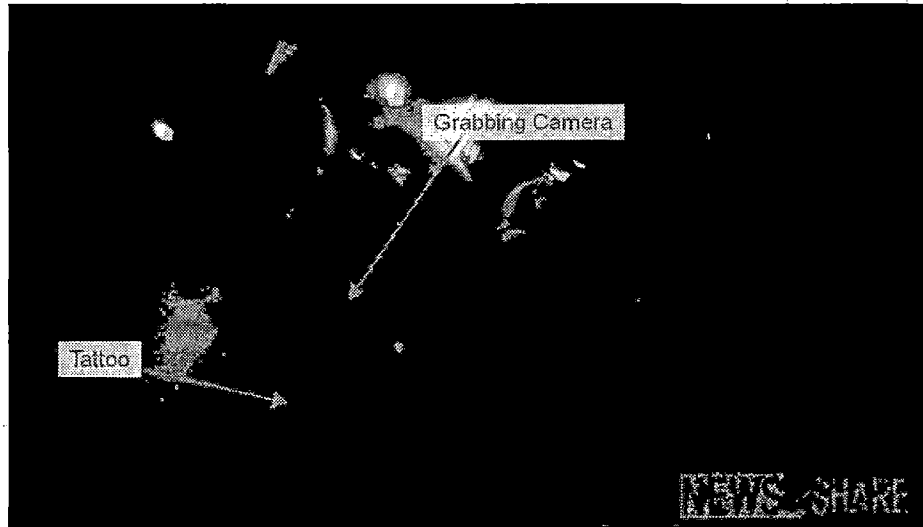
195. Cantwell wore the same body camera to the torchlit march that he did to the earlier meeting.



a.

196. Unfortunately, body camera footage of the torchlit march is missing, because the camera was stolen by Plaintiffs’ co-conspirator Lindsay Elizabeth Moers, after Plaintiffs’ co-conspirator “Beanyman” pepper sprayed Defendant Cantwell.

- a. See Exhibit125-MoersTakesCamera.mp4



i.

b. Media photo of Cantwell recovering from pepper spray after the fight.



i.

© Stephanie Keith for DailyMail.com

197. After turning himself in to Virginia authorities to answer for a warrant stemming from the Events in dispute, Cantwell waived his right to counsel and spoke to Sergeant Casey Accord of the UVA police. Cantwell told Accord about the body camera and asked him to find it. Accord informed Cantwell that the site had already been searched, and no camera had been found.

198. From the ACRJ, Cantwell continued to produce his podcast under the branding "Live from Seg!". He repeatedly called for listeners who might have been present and picked up the camera, to turn it over to his attorney. When the evidence was not forthcoming, he remarked "The Reds must have it"

concluding that anyone friendly to him would have provided him with the exculpatory evidence he desperately sought to vindicate him.

- a. This was later confirmed by video, as seen in Exhibit125-MoersTakesCamera.mp4

Gorcenski's Live Streams at UVA on August 11th

199. Gorcenski live streamed the August 11th events at UVA in four parts. These videos have since been removed from Gorcenski's Periscope channel, but were downloaded by Cantwell's attorney during the defense investigation for the Albemarle criminal matter.

- a. Those video files are provided here, without edit, as
 - i. Exhibit121-GorcenskiLS1.mp4
 - ii. Exhibit122-GorcenskiLS2.mp4
 - iii. Exhibit123-GorcenskiLS3.mp4
 - iv. Exhibit124-GorcenskiLS4.mp4
- b. It is worth noting that, in parts of the videos, the sound goes out of sync with the visual component. This was the condition of the video files when they were obtained by Cantwell, and not the result of any editing.
- c. The unedited video files also appear sideways and upside down at certain points, owing to the changing orientation of the camera during Gorcenski's recording.
- d. These imperfections are addressed, to the extent possible, in clips provided as subsequent exhibits, through editing performed by Cantwell.

What Actually Happened at UVA on August 11th

200. Cantwell arrived on the UVA campus later than planned, and made it to Nameless Field even later, owing to some confusion as to the parking ordinances.

- a. Cantwell's late arrival is captured on Plaintiffs' co-conspirator Gorcenski's livestream video, and can be seen in Exhibit126-CantwellArrives.mp4.
- b. As Defendant Mosely is briefing "security" personnel, Cantwell arrives on scene and rallygoers begin shouting his name.
 - i. **This stands in stark contrast to Plaintiffs' false claim that Cantwell was an organizer or leader of the events in dispute.**
- c. No mention of willingness to "get physical" is made, contrary to the false claim made by Plaintiffs in Paragraph 159 of the Second Amended Complaint.
 - i. This falsehood was likely lifted from the Heaphy Report (Exhibit12-Heaphy.pdf Page 117), as it was not included in Plaintiffs' initial complaint.
 - 1. Heaphy meant well enough, unlike Plaintiffs.
 - 2. The quoted phrase was uttered in another context about August 12th, in which Heaphy asked Cantwell about "militias" at the event.
 - 3. Cantwell had no knowledge of "militias" and noted that some people may have been more willing to "get physical" than others.
 - ii. **The next sentence of the same paragraph, which is conveniently ignored by Plaintiffs reads "*Cantwell was shocked by the absence of a law enforcement presence, and noted in his interview that 'if you notify law enforcement that white nationalists were going to march on a public university with torches, you would think they would take an interest.'*"**
 - iii. **This serves as further evidence of Plaintiffs' bad faith, and that of their counsel.**
- d. After Cantwell arrives, Mosley asks "Does anyone not understand?" and another participant asks him to repeat it. This is the point at which Cantwell is briefed on the plan.
- e. Mosley briefs the attendees on a plan to keep those with torches separated from "Antifa" and "counter protesters".

- f. The explicit purpose of this operation was to keep the fire away from counter protesters, for their own safety. None of it should have been necessary, since law enforcement was contacted in advance to avoid exactly this situation.

201. The actual selection process for who ended up being on the outside of the formation is captured on Gorcenski's 2nd livestream video

- a. This is excerpted as Exhibit127-IfYouDontHaveATorch.mp4
- b. Mosley can be heard saying "If you don't have a [expletive] torch, get up to the front of the line."
- c. At the front of the line, another rallygoer instructed torchless participants to go right or left, as captured on Exhibit126-CantwellArrives.mp4

Clear Evidence of Plaintiffs' Premeditation

202. Gorcenski's livestream videos provide compelling evidence of Plaintiffs' premeditation, especially when taken in the context of other statements made throughout the timeline.

203. In the leadup to the events in dispute, Plaintiffs and their co-conspirators tried to have the rally permit revoked by falsely claiming Defendants were intent on violence.

- a. As evidence of this supposed conspiracy by Defendants, Gorcenski claims to have provided the Charlottesville City Council with "21 pages of threats" **in advance** of the events in dispute. See Exhibit28-CapitalOfAntifa.mp4
- b. These supposed "threats" were collected by the antifa "intel networks" Gorcenski later bragged about on Twitter, and likely had a great deal of overlap with the edgy jokes cited by Plaintiffs in their complaints.



i.

204. Despite knowing about these supposed threats in advance, Gorcenski was completely fearless when approaching Defendants' formation at the University of Virginia. For no less than 30 minutes, Gorcenski walked in and out of the formation, spoke to rallygoers, and followed their formation no more than a few feet away most of the time.

- a. A montage of Gorcenski's fearless engagement with the rallygoers can be seen in Exhibit128-GorcenskiUnafraid.mp4
- b. Gorcenski mocked and insulted participants.
- c. Gorcenski self-identified as the "chief agitator" of "antifa".
- d. Gorcenski said "Is there anything less menacing than a tiki torch?"
- e. Gorcenski refers to Defendants' security precautions as "security theater". If Gorcenski actually believed the supposed 21 pages of

“threats” then this would obviously have been perceived as something rather intimidating, and unworthy of the mockery.

205. Gorcenski was not just capturing the moment for the historical record. The stream served other purposes, such as providing reconnaissance for the planned assault on Defendants. The Periscope live stream video was viewable by anyone with a smartphone, and Gorcenski used this medium to deliver important strategic information to Plaintiff Magill, Philly Antifa, and other co-conspirators, who were preparing to ambush Defendants at the Rotunda.

- a. See Exhibit 129-GorcenskiRecon.mp4
- b. Gorcenski gives repeated headcounts
- c. Gorcenski repeatedly calls out the location of the Defendants
- d. Gorcenski relays information about the planned timing of Defendants’ movements.

206. Gorcenski’s demeanor changes dramatically, just before Defendants’ march reaches the Rotunda.

- a. See Exhibit 130-Showtime.mp4
- b. Gorcenski runs away from Defendants’ procession to beat them to the Rotunda.
- c. From a safe distance, Gorcenski utters to an associate “If they pull [expletive] on me, their whole movement comes to an end”.
 - i. **This is precisely Gorcenski’s motive for staging the scene which brings us to this proceeding.**
- d. As Gorcenski approaches the Rotunda, Gorcenski says “I’m putting my camera down for a minute” before approaching the co-conspirators laying in wait for the ambush.
- e. Another co-conspirator can be heard saying “Heads down guys, heads down!” before beginning with the theatric “anti-racist” chant of “No Nazis! No KKK! No Fascist USA!”
- f. Gorcenski warns a co-conspirator “There’s a [expletive] lot of them!”

- g. The co-conspirator replies "I know" (courtesy of Gorcenski's recon data).
- h. A co-conspirator can be heard saying "Okay guys, this is important to all of us!"
- i. Contrary to Gorcenski's claim of being surprised by Plaintiffs' waiting ambush, everyone clearly knows who everyone is. Not one introduction is made. Nobody says "Nice to meet you" or "It's okay, I'm on your side".
- j. Gorcenski raises the camera just enough to film the feet of Plaintiffs' other co-conspirators, cautiously raising it to catch the faces of women and black males, but making sure to avoid the faces of Philly Antifa, and Plaintiff Magill, as well as the weapons and disguises of those carrying out the violent portion of their "diversity of tactics".
- k. Gorcenski says "This is what we have to stand against them. UVA Students, people of color" mentioning only the sympathetic decoys, and neglecting to mention the masks, weapons, and nighttime sunglasses of those there to commit a crime.
- l. Suddenly, Gorcenski pretends to be terrified. After more than 30 minutes of close quarters mockery, calling Defendants "pathetic" and their security measures "theater", Gorcenski pretends to be on the verge of tears, as though death was imminent.
- m. Despite this supposed fear, neither Gorcenski, nor any other of Plaintiffs' co-conspirators, take the ample opportunity to flee the scene.
- n. Taken together, it becomes obvious that this was all part of a carefully staged plan.

207. Taken in this context, Plaintiffs' premeditated conspiracy is made even more obvious when one listens to Gorcenski's "guilty conscience" utterances on the live stream videos. Speaking entirely for the benefit of the record, Gorcenski repeatedly assures the viewer, including Agent Wolf of the Federal Bureau of Investigation, that "antifa" is not planning anything violent. When viewed in the context of what actually happened, this becomes downright humorous.

- a. See Exhibit131-GorcenskiGuiltyConscience.mp4

b. Gorcenski says "We're here to do what we always do, and that is, shine the light on the reality of what their message is".

i. This is comical, since the entirety of Gorcenski's efforts prior to the events in dispute was to try and prevent the march from ever happening. Gorcenski's stated view is that Defendants' message should be illegal, and they should be deprived of their civil rights.

c. Gorcenski says "Yeah, a lot of people are telling me to be safe. You know, I don't think that anyone here is stupid enough to start violence. Um, I'm not expecting violence at this. I'm here to show what's happening so that everyone can see the fact that white supremacy and fascism is back in the United States. I don't need to start violence here to do that. Their words can do that themselves. When you start talking about ejecting people from an entire continent because of their skin color or their religion that's pretty much the definition of White Supremacy."

i. The statement of not expecting violence stands in stark contrast to the narrative Plaintiffs peddled to the community and city council prior to the events in dispute. Gorcenski and other co-conspirators reportedly handed "21 pages of threats" to the city council. See Exhibit28-CapitalOfAntifa.mp4

ii. Gorcenski's guilty conscience is evident when the implication of safety immediately causes him to deny that he and his associates are there to "start violence". If Gorcenski was not planning an assault, he would not have assumed the instructions to be safe had anything to do with their party "start[ing]" the violence. Gorcenski knew what was being planned, and said this as a reflex denial.

iii. Gorcenski planned the assault because he does not want Defendants' words being heard by anyone, because he knows that we have no intention of "ejecting people from an entire continent for the color of their skin or their religion" and his entire dishonest existence depends on suppressing any truth about what Defendants' true aims are.

d. Gorcenski says "*We saw Christopher Cantwell have a rally today. Organized at the Walmart parking lot. We were there to capture that. The media showed up to capture that. We did not call in that, ah,*

brandishing the gun. That was a customer, inside the store. Which is proof that it is not just the "Antifa" that he is terrorizing, but actually the community in and of itself. We didn't need to do that, in fact, I got to that meetup a few minutes late".

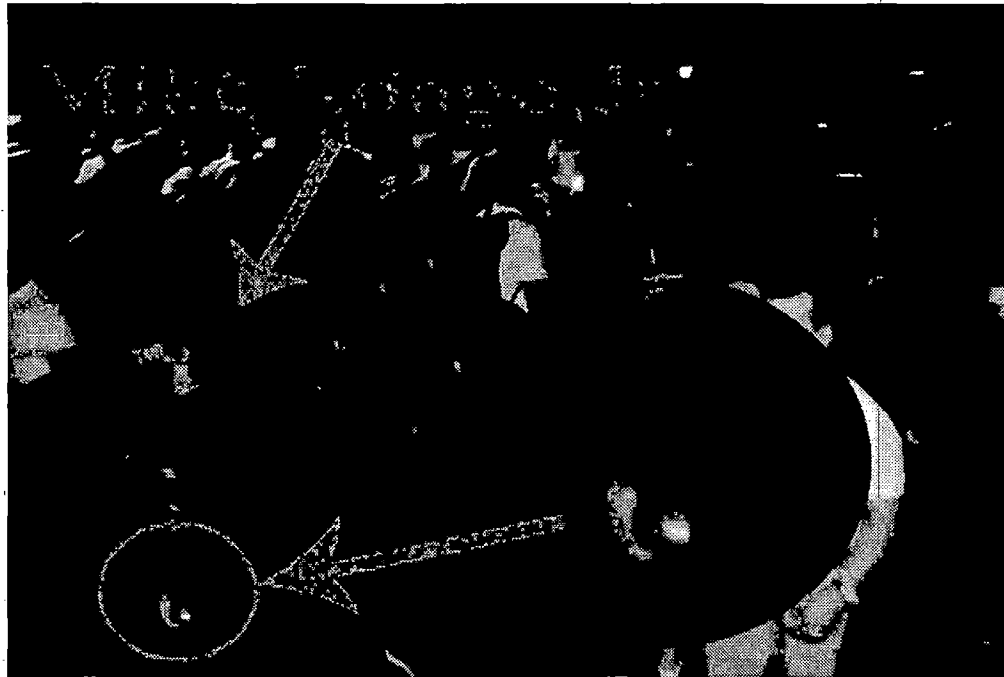
- i. This is vital, because Gorcenski denied knowing the Philly Antifa thugs who accosted Cantwell's party in the parking lot, and yet, Gorcenski now identifies himself as "we" along with that group, and claims to know whether or not that group called in a false report on Cantwell.
 - ii. As Cantwell's body camera proves definitively, Cantwell did not pull a gun on anybody, much less a random Walmart shopper, and did not enter the store at any time. Gorcenski claims that Cantwell pulled a gun on "a customer inside the store" because Gorcenski **knew the 911 call was made by Mike Longo Jr. from inside the Walmart.**
- e. Gorcenski says "We've got fascist toilets over here, the Port-A-Johns, ah, were I to run a violent op, those Port-A-Johns are on a hill, and they are probably pretty easy to push over, but I am not running a violent op. Shout out to Agent Wolf of the Federal Bureau of Investigation. Somebody online called in a threat, and it was very easy for me, I just told him the truth, which is, we're planning a non-violent rally."
- i. Again, Gorcenski's prior statements render this implausible. Either Gorcenski was planning on having a "non-violent rally" or Gorcenski was planning to confront violent criminal Nazis intent on violence. Both cannot be true. Gorcenski is trying, unsuccessfully, to divert suspicion, concerned with the FBI prudently monitoring his activities.

Plaintiffs' Co-Conspirators Came Unlawfully Armed, with Violent Intent.

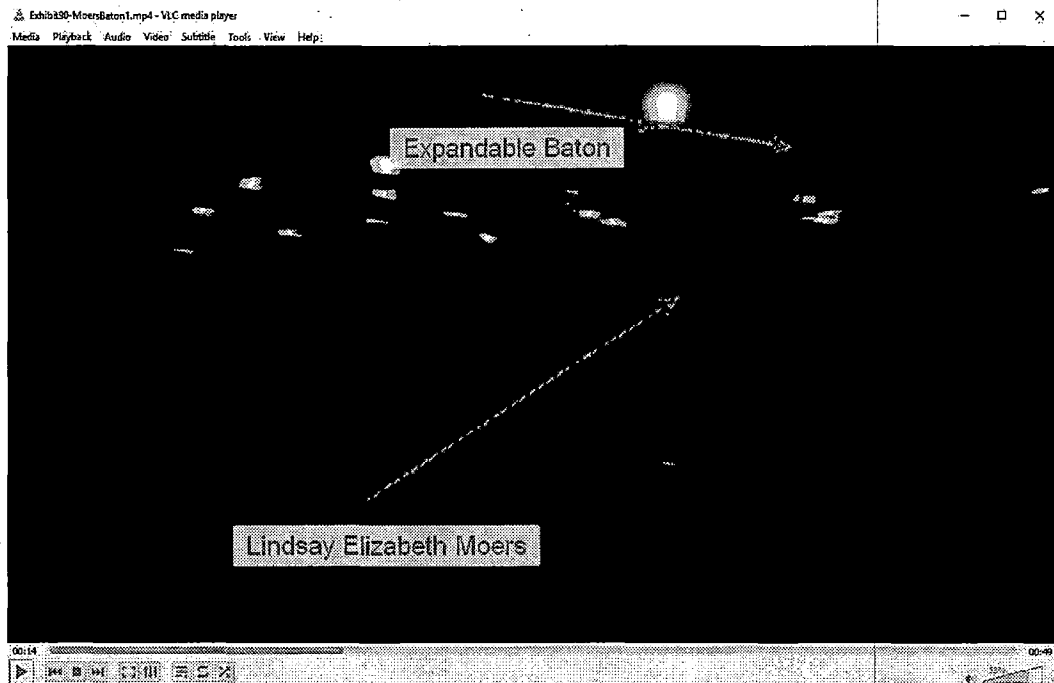
208. Plaintiffs have materially deceived this court by claiming that the people Defendants allegedly "punched and kicked" in paragraph 167 were "protesters" or more laughably in Paragraph 168 "peaceful protesters around the statue", when they were in fact, violent criminals.
209. The "Peaceful Counter Protesters" were armed with guns, pepper spray, weighted gloves, and expandable batons.

210. While Defendant Cantwell knows all too well that being armed does not equate to being violent, Plaintiffs have repeatedly alleged the opposite throughout their complaint and subsequent filings. Moreover, none of the Defendants are alleged to have brought firearms to the UVA campus, which is illegal. Only co-conspirators of Plaintiffs were brazen enough to break this law, as shown below.





c.



d.

211. The one thing that becomes most obvious upon even a cursory review of the video evidence, is that the violence at UVA was intentionally initiated by co-conspirators of the Plaintiffs in this case.

Plaintiffs' Co-conspirators Wore Disguises, Evincing their Criminal Intent

212. Lindsay Elizabeth Moers wore sunglasses and a hat, and when conscious of camera, concealed her tattoos.

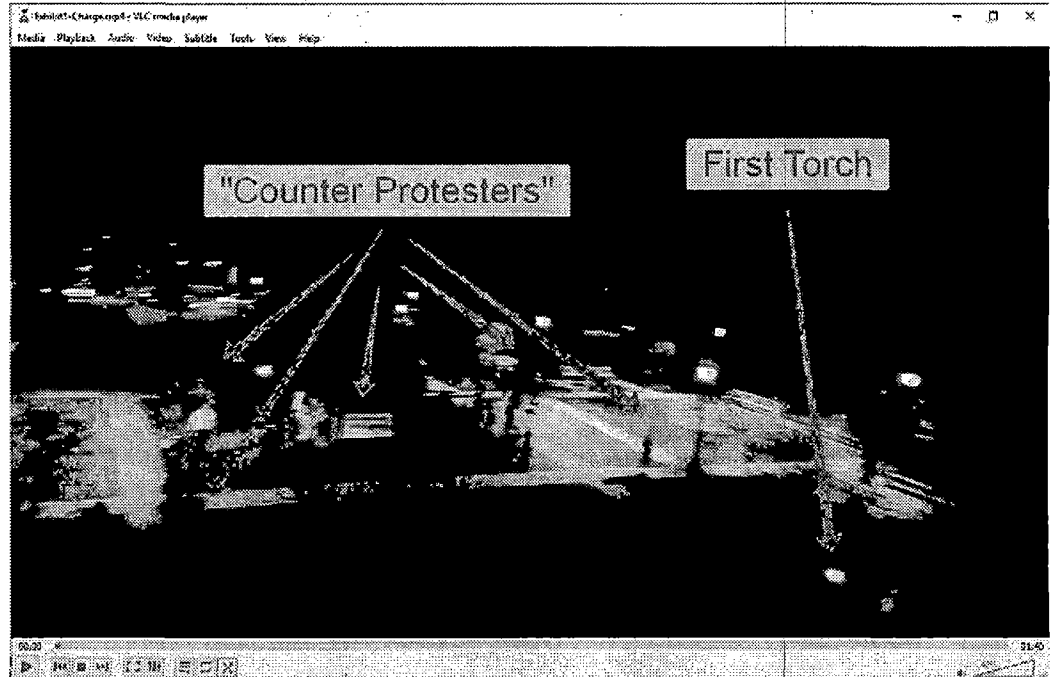
213. Brian Bozicek wore all black, sunglasses, and a skull cap.

The "Charge"

214. Plaintiffs have materially deceived this court by stating in Paragraph 163 of the second amended complaint that Defendants "charged toward a small group of fewer than 30 people" as well as in Paragraph 164 by stating Defendants "rushed down the steps".

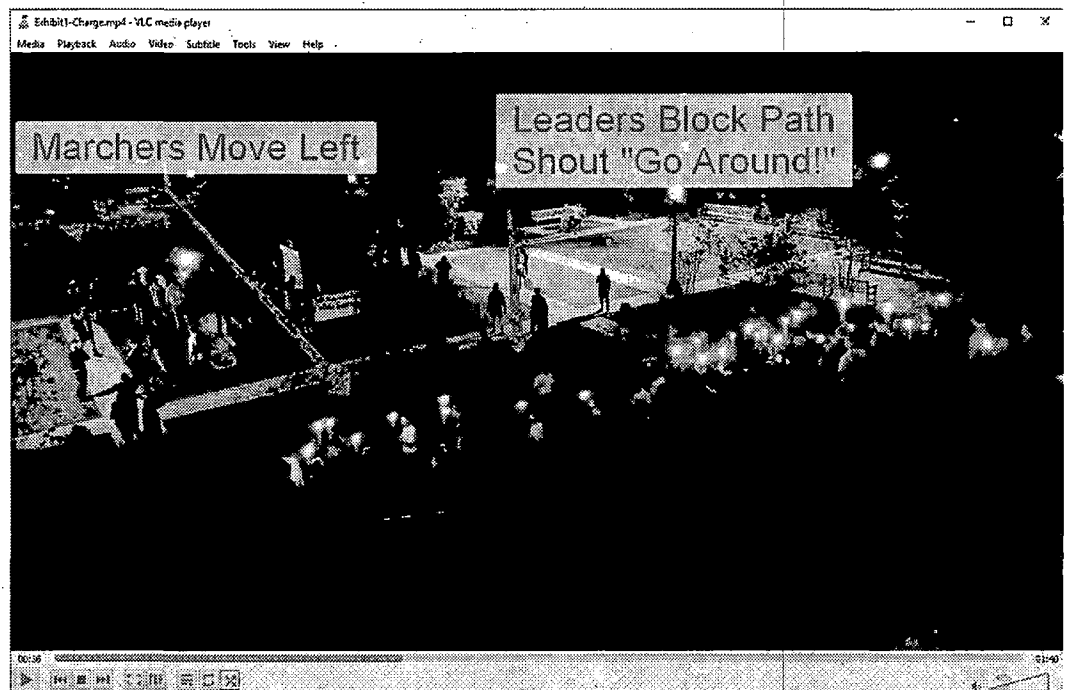
215. In fact, defendants slowly and calmly walked down the stairs, as evidenced by dozens of videos.

- a. See Exhibit1-Charge.mp4
- b. This video was part of a compilation, and as such fails to capture the Plaintiffs' co-conspirators being fully surrounded, but it can be seen that Defendants had not fully surrounded them after one minute and forty seconds.
- c. As Defendants came down the steps of the Rotunda, they were surprised to see the counter protesters. While the original plan was to walk straight down and encircle the monument, the sight of counter protesters, and lack of expected law enforcement presence, initially caused them to change course.



i.

- d. Defendants initially walked to the left, away from the monument, then.



i.

- e. Unwilling to let criminals disrupt their lawful demonstration, Defendants and their associates, slowly, and calmly, walked toward the monument, and began to carry out their original plan. Plaintiffs

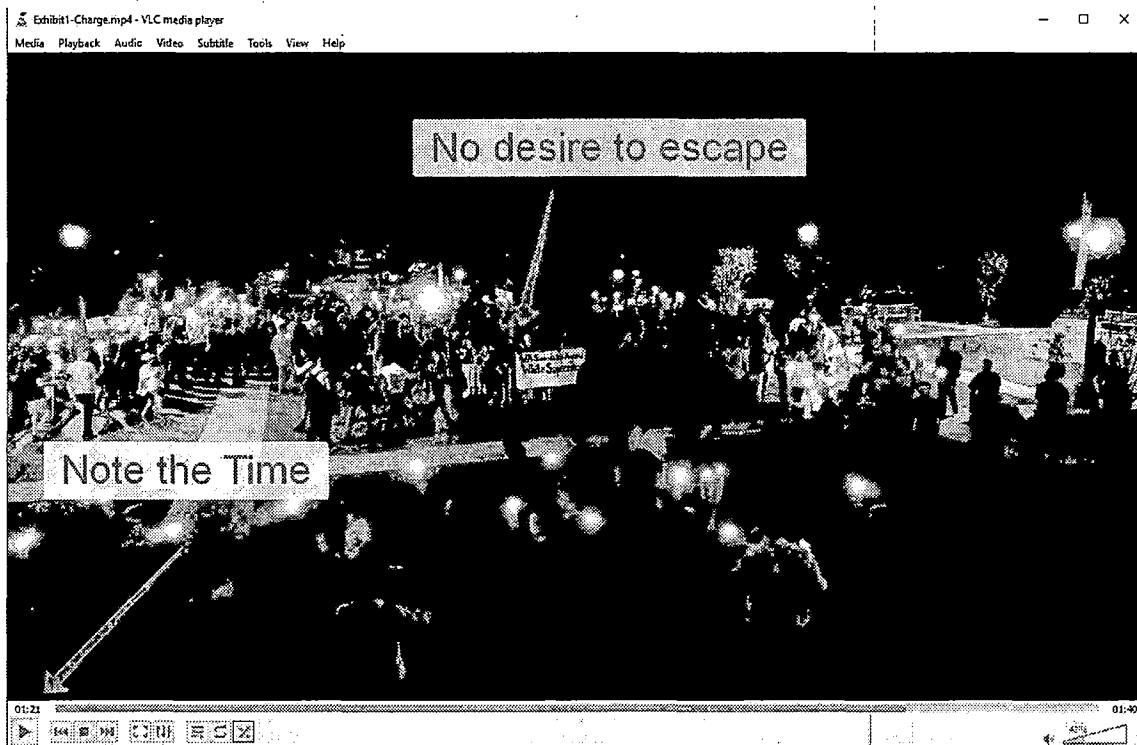
and their co-conspirators had ample time and space to leave, but instead carried through on their original plan, to assault Defendants.



Means of Egress

216. Plaintiffs have materially deceived this court by claiming in Paragraph 165 of the second amended complaint that “As they reached the statue, Defendants and co-conspirators stood shoulder to shoulder and encircled the students to trap them” and in Paragraph 172 by stating “Encircled by Defendants and coconspirators, John Doe felt trapped and did not believe that he could escape safely. He knew that as an African-American man, if he had tried to escape before the group dispersed, he would have been attacked.”

217. As shown in Exhibit1-Charge.mp4, attached, Plaintiffs had no less than 1 minute and 40 seconds, as Defendants slowly and calmly surrounded the statue, as had been their plan since before the Plaintiffs and their Antifa criminal associates attempted to disrupt their event. This left ample opportunity for Plaintiffs to flee the scene if they felt threatened by Defendants, or otherwise saw fit.



a.

218. As for Plaintiff Doe's paranoid ethnocentric concerns, Plaintiff Doe seemed thoroughly unconcerned with his capacity for flight, as Defendants slowly and calmly circled the monument, leaving ample room for egress for no less than one minute and forty seconds, as previously shown in Exhibit1-Charge.mp4.



a.

219. Without Plaintiff Doe identifying himself, Defendants will have difficulty determining which of at least three Afro-Americans are depicted in the video of Plaintiffs' and their co-conspirators' premeditated assault on Defendants' lawful demonstration, but it may help the Court to know that the one with the backpack did not seem to feel at all threatened, as he approached and followed rallygoers, which is depicted quite plainly in Exhibit5-BlackMales.mp4.



a.

220. Plaintiffs contradict themselves in Paragraph 173 of the second amended complaint, further displaying their duplicity, by immediately following these hysterical claims of being trapped too afraid to escape, when they then say "Fearing for their lives, Plaintiffs John Doe, Romero, and the other protesters struggled to escape the mob." Both cannot be true, and in fact, neither is.

221. It is also worth noting here, that none of the African-American Plaintiffs or co-conspirators filed any criminal complaints against Defendant Cantwell or anyone else, nor is there any claim of documented injury, just the dubious claim of "I got pepper sprayed too" which seemed to be going around a lot that night, and curiously, more and more by the day in the weeks and months that followed.

222. Plaintiffs paint a cartoonish picture of bloodthirsty White Supremacists who launched a premeditated assault on people they were trying to avoid, after calling the police and reporters as though getting caught were also part of the "conspiracy", only to decline taking credit for the supposed attack once it happened. The idea that these supposed racially motivated marauders saw fit not to leave any bruises on any of the black males, defies reason, to say the least of it.

Who Attacked Who?

223. Necessarily, this entire case rests on a single question. Who started the violence? If it was not Defendants, then the whole conspiracy theory falls apart. Defendants cannot be sued for unlawfully conspiring to lawfully defend themselves against violent criminals who attack them without provocation.

224. Given the facts outlined above, that Defendants called law enforcement in advance, tried their best to keep their plans a secret from their opposition, invited the Press, and in the case of Cantwell, wore a body camera, this question ought to answer itself.

225. Clearly, the fact that we find ourselves at this juncture is proof of an extraordinary presumptive burden upon the Defendants, owing to media deception, political pressure, Plaintiffs' brazen dishonesty, and destructive cultural influences of conspicuous ethnic origin. Defendants are thus fortunate to have video proof of this, too. It is a substantial omission by Plaintiffs to jump right from the false claim of "rushing" and "charging" to "punching and kicking" without mentioning the provocations of Plaintiffs criminal associates from Philadelphia.

226. Thomas Massey, who Defendant Cantwell would like to remind everyone again, was subsequently charged with robbery and ethnic intimidation in Philadelphia, for doing to two US Marines in that city, what he attempted to do to Defendants at UVA, clearly came intent on fighting, and carried through on that intent, by throwing the first punches.

a. This can be seen in the final seconds of Exhibit1-Charge.mp4

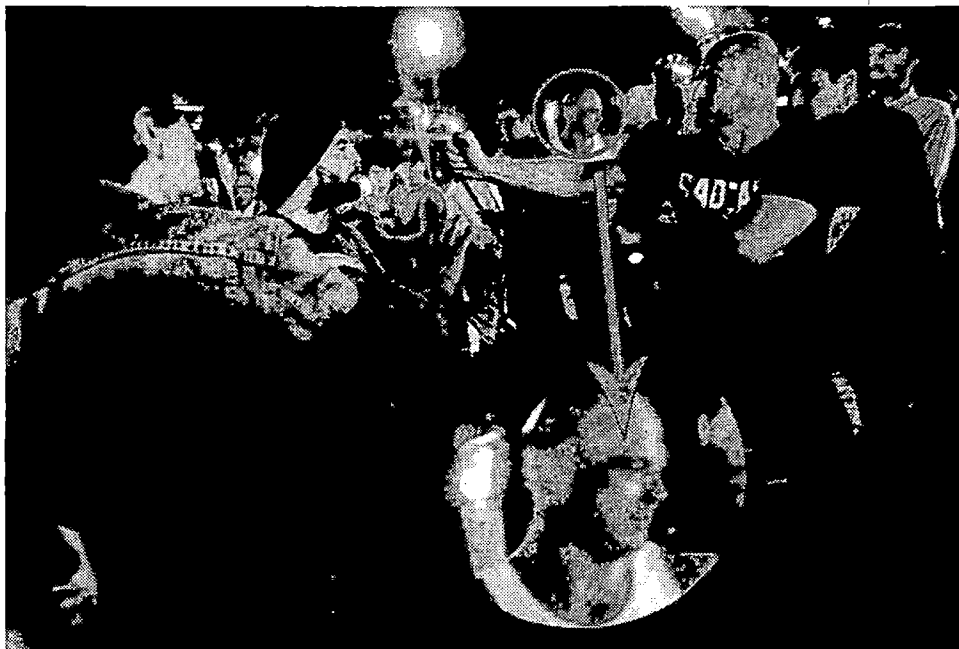
b. It can also be seen in Exhibit2-Attack.mp4



c.

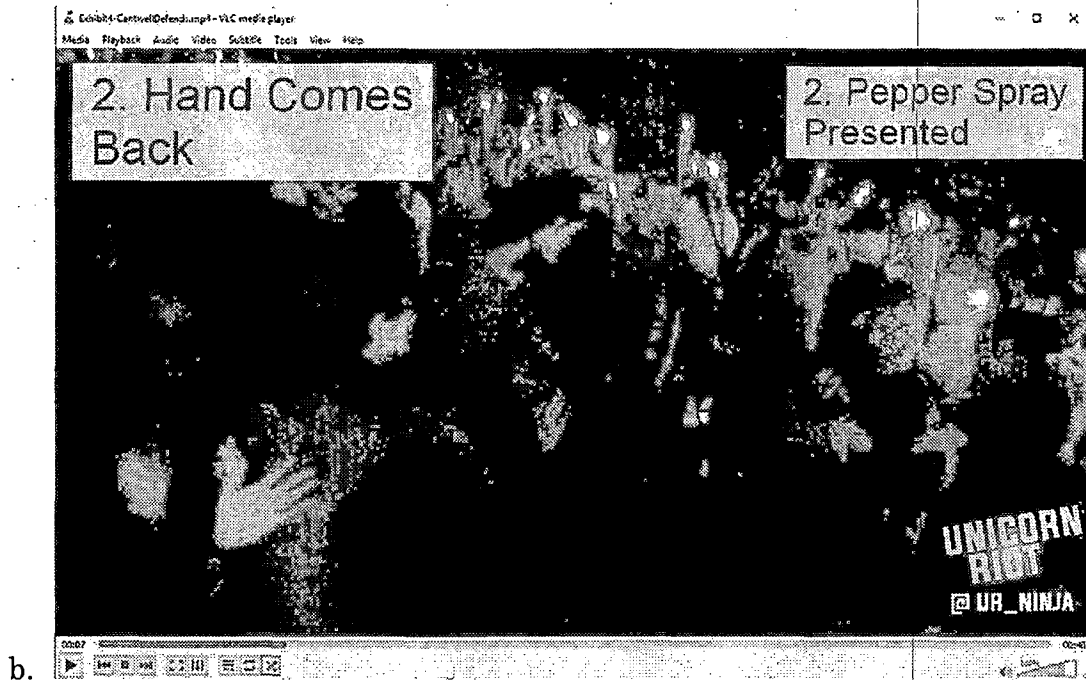
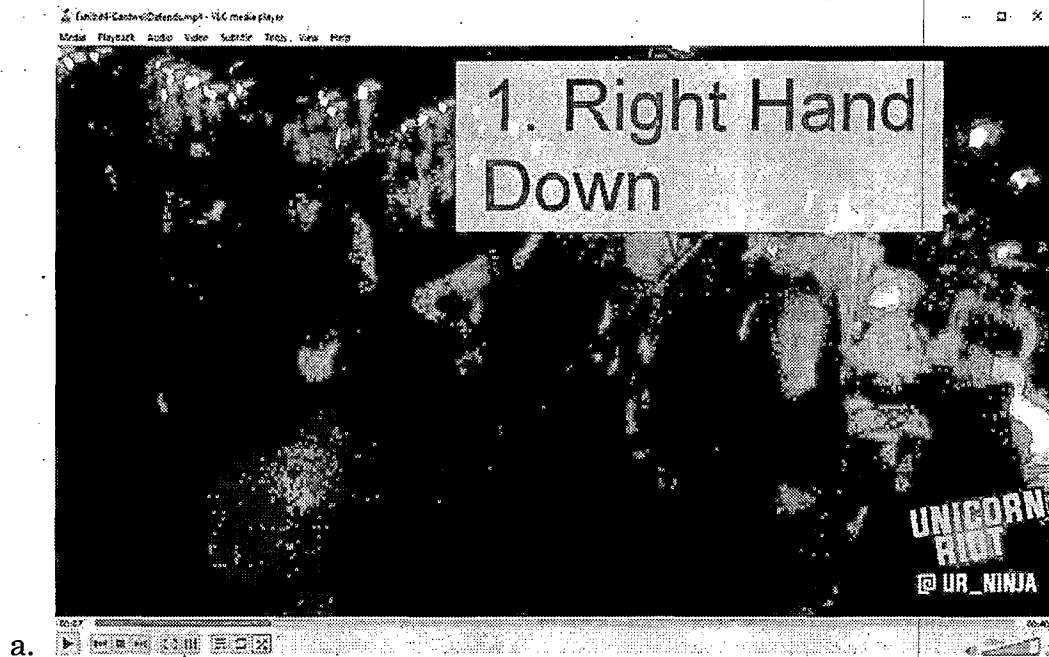
227. More aggression by Tom Massey, before anybody hits him back, can be seen in Exhibit3-Fight.mp4

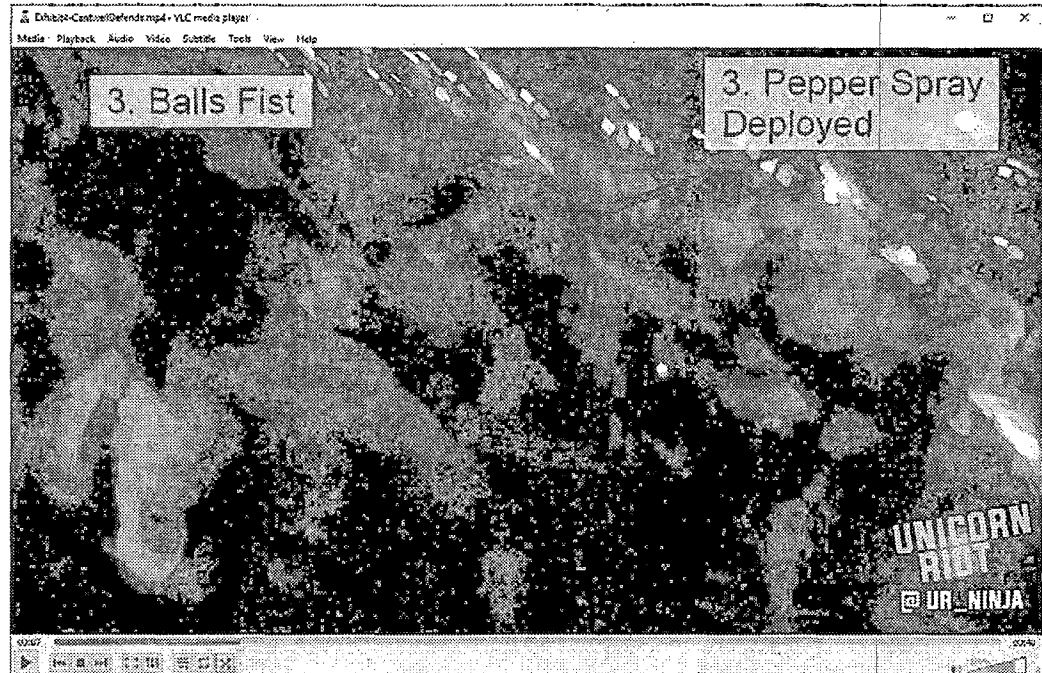
228. It is only at this point that the much talked about photograph, which has, perhaps more than any other thing, ensnared Defendant Cantwell in the lawfare of the last two plus years, is taken. Plaintiffs sure do love that photo. Let us give it a closer look.



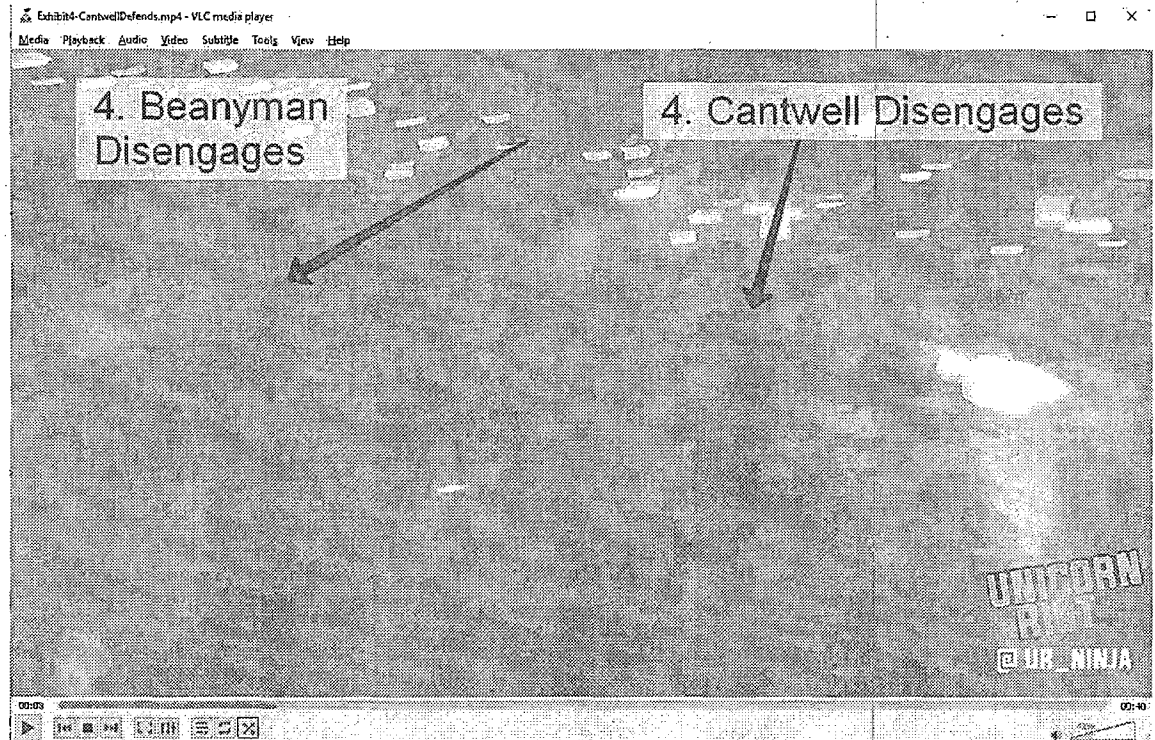
a.

229. Defendant Cantwell's defense investigation in Albemarle County, commonly referred to this criminal as "Beanyman" for sake of his peculiar hat.
230. In Exhibit4-CantwellDefends.mp4, Beanyman and Tom Massey can both be seen attacking the man in the white tank top.
231. In this much talked about photo, we can see the injury Beanyman and Massey inflicted above the left eye of Mr. Tank Top.
232. Not wanting any more such injuries to ensue, pepper spraying Tank Top's assailants, seemed quite prudent, to the now terrified Defendant Cantwell.
233. This gang assault takes place right in front of Defendant Cantwell, who was already in fear of this life, after members of Massey's entourage, including Mike Longo Jr., who maced Cantwell without provocation the next day, in coordination with Gorcenski, attempted to assault him and frame him for brandishing at Walmart earlier that afternoon. So afraid for his safety was Cantwell, that he refused to participate in this event without police protection, and yet no police protection was forthcoming.
234. Only after all of that, did Defendant Cantwell, fearing for his safety, and for the outcome of a larger fight with torches, deploy his pepper spray in the hopes of stopping this conflict before it got out of control.
235. Cantwell deployed his pepper spray at an individual who is not party to this suit, and who had just committed a gang assault, which inflicted a clear and serious injury above the left eye of the man in the tank top.
236. In Exhibit4-CantwellDefends.mp4, Beanyman can be seen cocking his fist back, and looking directly at Cantwell, before Cantwell deploys his pepper spray.





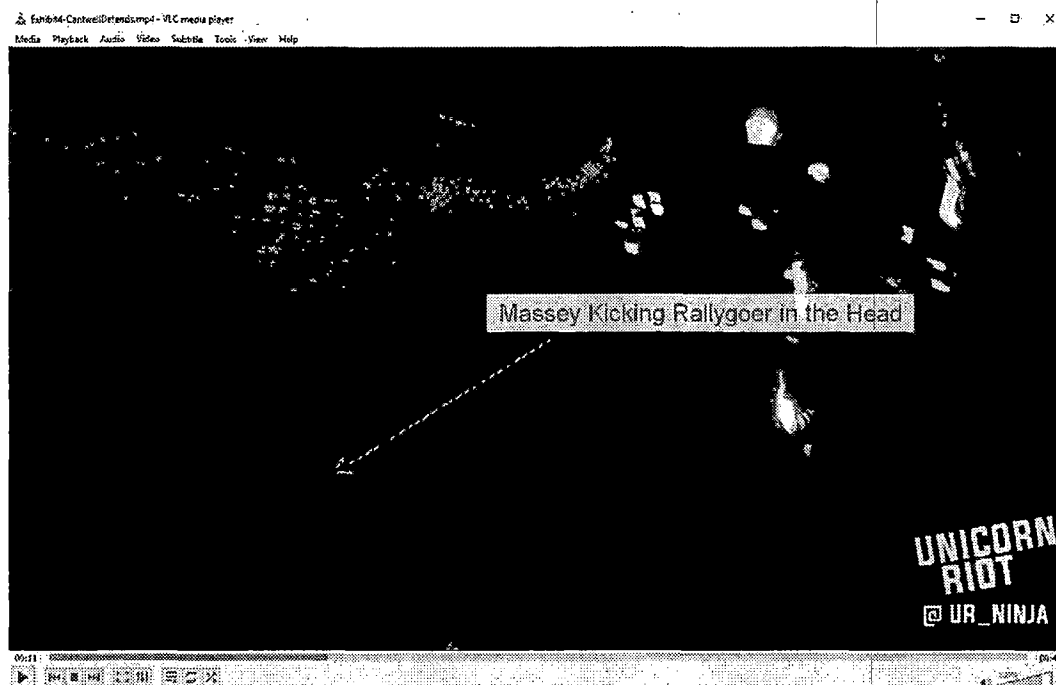
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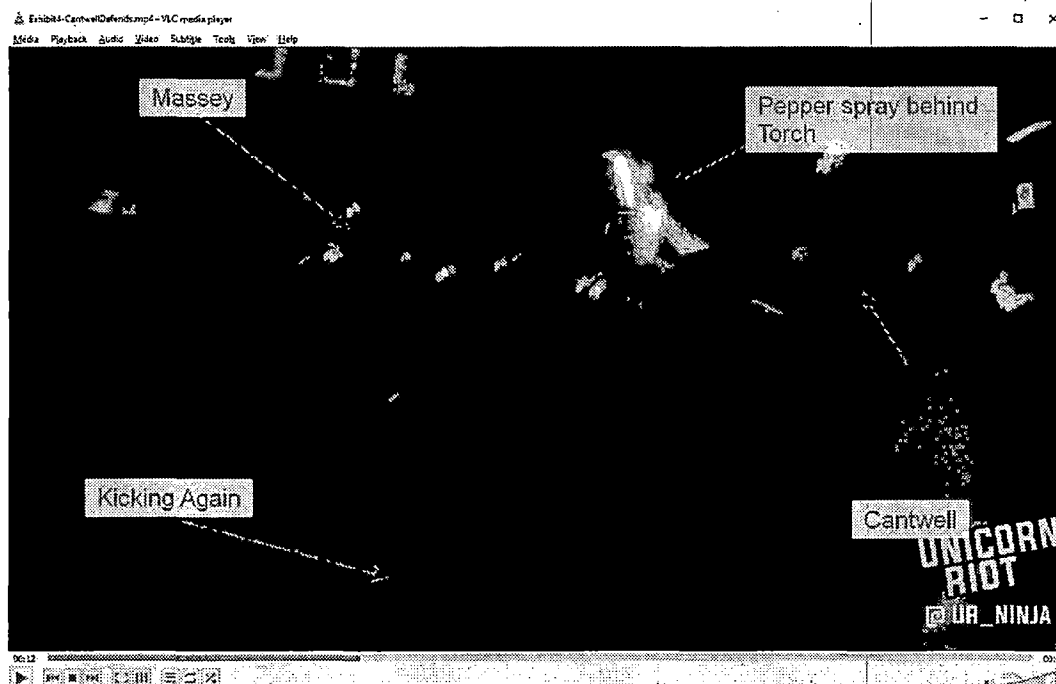
d.

237. It was as clear an act of self defense as one could hope to catch on camera.

238. After Beanyman disengaged, Cantwell sees Massey kick another participant in the head, and with his pepper spray depleted, punches Massey several times.



a.

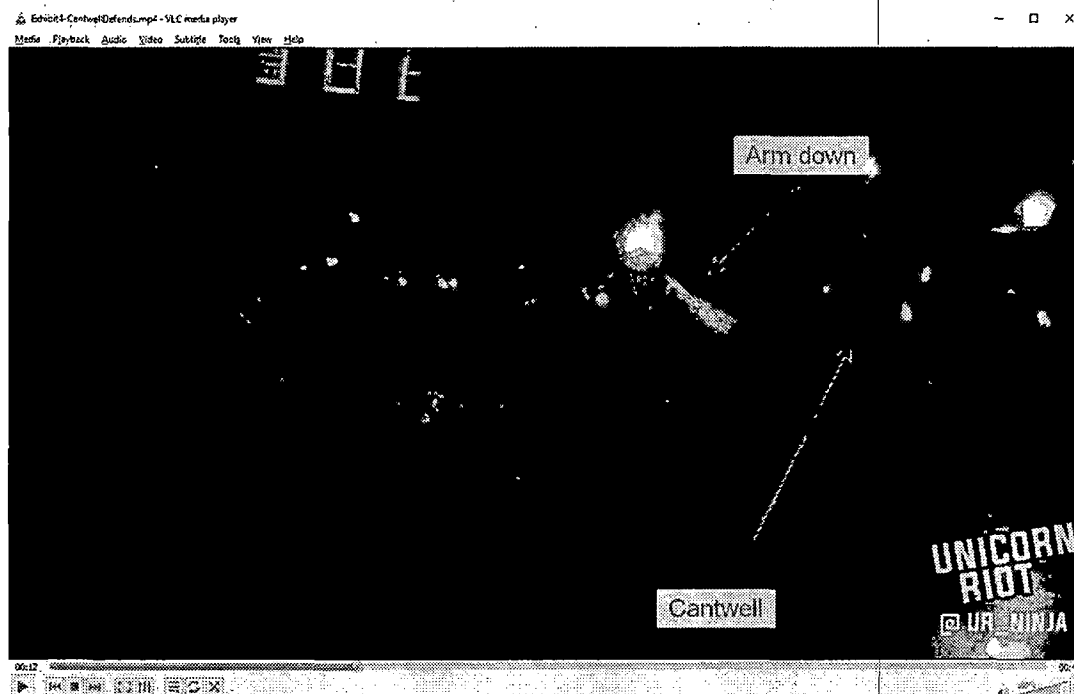


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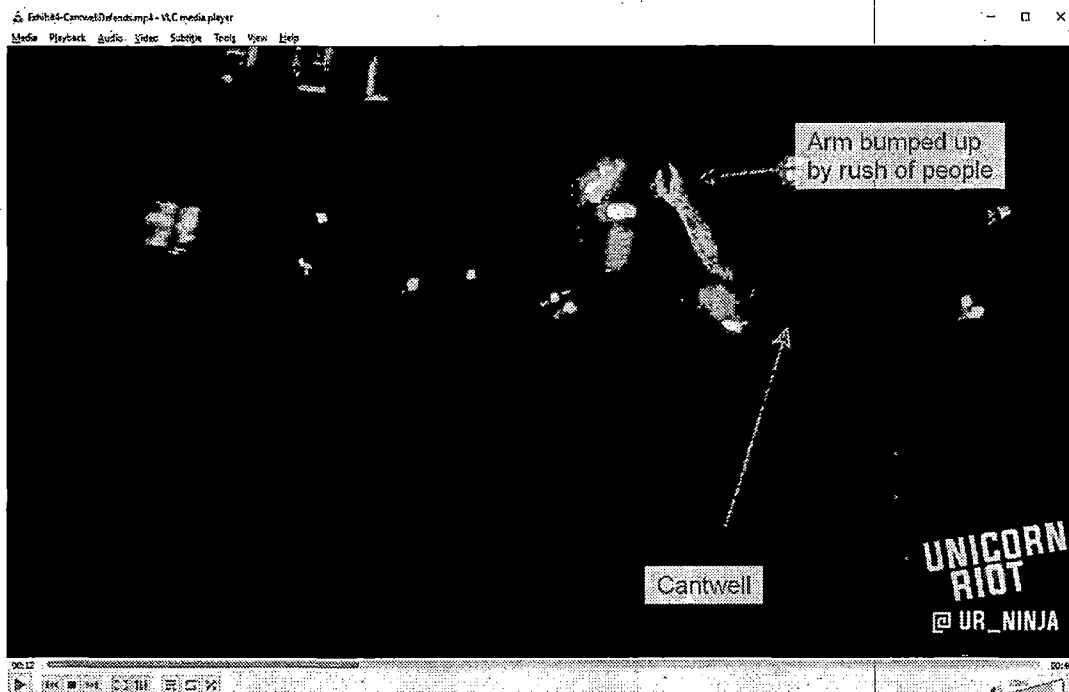


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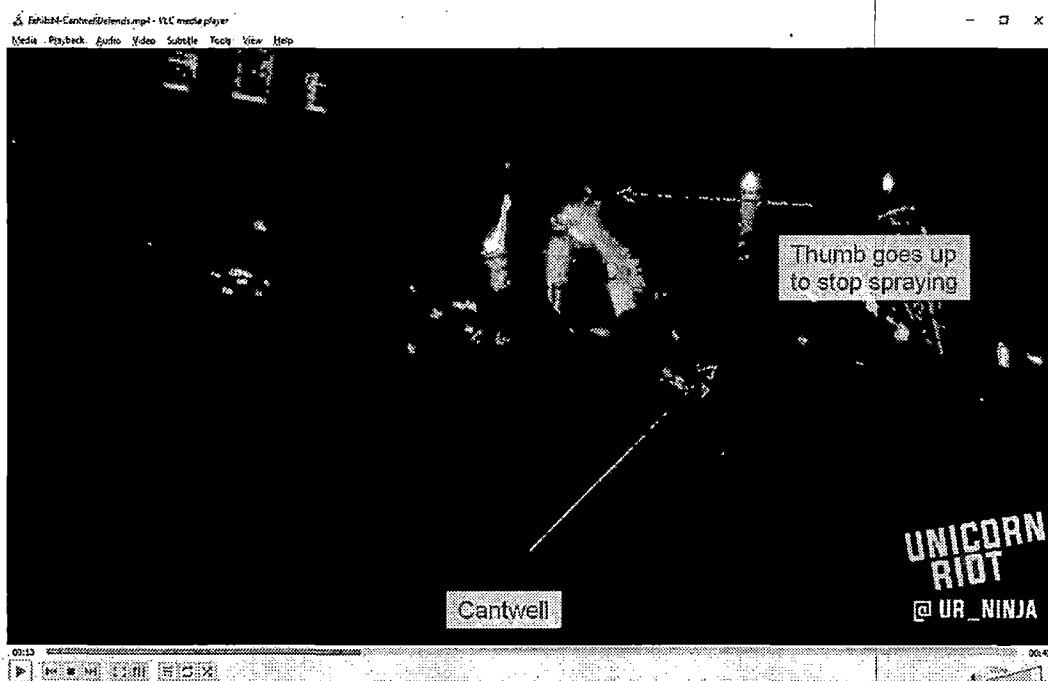
239. When Gorcenski falsely claimed to have been affected by Cantwell's spray, it was alleged that Cantwell was spraying his pepper spray in the air to attack the crowd. Aside from the obvious fact that this would be retarded, in that it would equally impact Cantwell's fellow demonstrators, it can be seen in the video that Cantwell takes his thumb off the button, when his arm is bumped upwards by others rushing in to stop the assault.



a.



b.



c.

240. It may also help the Court to note, that while Kristopher Goad turned out to be Jewish, this was surely unknown to Defendant Cantwell as he saw what appeared to be a gang of large white males attacking his associates. Everyone Cantwell engaged that evening was White, and all of them were engaged in violence at the time.

241. Cantwell and his associates completely ignored the black and brown non-combatants, as they went to work stopping the threats to their safety.

The Mayhem Continues

242. Plaintiffs' co-conspirators were, sadly, undeterred by Cantwell's judicious use of self defense spray, and continued fighting.

243. Cantwell only engaged combatants as he made his way around the statue.

244. Cantwell spotted Lindsay Elizabeth Moers wielding an expandable baton at the heads of rallygoers. He shouted "Take that [expletive] from her! Right now!" and rushed in to disarm Moers.

245. As Cantwell rushed in, Beanyman pepper sprayed Cantwell, and Moers grabbed the body camera from Cantwell's shirt, as shown in Exhibit125-MoersTakesCamera.mp4

246. Cantwell removes himself from the fight, and was treated for pepper spray by law enforcement.



247. Cantwell did not run away from the police. Quite the contrary, he spoke freely to both law enforcement and media.

After Action

248. Exhibit 139-AfterShow is a video compilation showing Gorcenski from the last moments of the fight, up until police force Plaintiffs' co-conspirators to leave the scene.

249. After the fighting stops, Gorcenski calmly remains in the crowd, and begins playing with his phone. Gorcenski can be seen calmly removing his own glasses from his face, and placing them into his hair.

250. Surrounded by torch bearing rallygoers, seconds after the fight, Gorcenski shows no fear at all, while he taps away on the smartphone. He then wipes his eyes several times, as "counter protesters". and Leftist combatants alike, walk away unmolested.

251. Then, Gorcenski restarts the live streaming feature on the smartphone, and puts on a show for the audience. Gorcenski claims to have "just" been pepper sprayed, that his glasses were pushed into his hair by violent Nazis, and that police did nothing to protect the innocent counter protesters.

252. Gorcenski accosts the police, all but accusing them of complicity in the mayhem Plaintiffs' co-conspirators had just perpetrated.

253. Gorcenski says "Antifa didn't spray shit. They sprayed us. They sprayed us. They attacked us". Though a blatant lie as video proves, this is accurate insofar as it demonstrates that "us" is "Antifa".

August 12th

254. Contrary to Plaintiffs' claims, Cantwell's involvement on August 12th was quite minimal.

255. Cantwell was instructed to arrive at McIntyre Park, where a van would shuttle him to the entrance of Lee Park.

256. Much to Cantwell's surprise, the van would be dropping him off blocks from the event, and he would have to walk through a gauntlet of hostile demonstrators, who hurled projectiles at him and his associates.

257. Having had his body camera stolen by Lindsay Elizabeth Moers the previous evening, Cantwell instead carried a handheld camera on his way to the event. On this, Cantwell captured Mike Longo Jr. pepper spray him without provocation.

258. As Cantwell was treated for his second pepper spray assault in as many days, one rallygoer says "We're gonna kill em!" and Cantwell says "Don't kill anybody!". This being in stark contrast to Plaintiffs' repeated assertions that Defendants "took no steps" to prevent or mitigate violence.
259. While still recovering from the attack, Cantwell was informed that police declared an unlawful assembly, and unlike the Plaintiffs, Cantwell heeded the command.
260. Cantwell and others walked out of the park, into the mob, and braved attacks from projectiles, fists, and pepper spray as they attempted to escape.
261. Asked by Vice News if rallygoers were the true non-violent protesters, Cantwell states "*I'm not even saying we're non-violent. I'm saying we didn't aggress. We didn't initiate force against anybody*".
262. The van took Cantwell and others back to McIntyre Park, and from there, Cantwell went back to his hotel room to shower off Longo's pepper spray.
263. Cantwell heard through social media, that Gorcenski claimed a warrant was out for his arrest.
264. Cantwell called the Charlottesville police department, inquiring to the truth of this, but they would not confirm or deny the rumor.
265. Seeing a press conference in which the police chief asked rallygoers to leave, Cantwell heeded the advice, but instead of heading North to New Hampshire, went to North Carolina, to seek legal counsel, and to determine if the warrant rumor was true.
266. Cantwell was contacted by Special Agent Phil Christiana of the FBI's Joint Terrorist Task Force out of Boston. Christiana wanted Cantwell's help in preventing violence at an upcoming rally in Boston.
267. Cantwell told Christiana he would love to help, but was busy dealing with the aftermath of the events in dispute. Cantwell asked Christiana to confirm the warrant, and moments later, Christiana called Cantwell back confirming that a warrant had been issued by UVA police.
268. Cantwell obtained the counsel of Elmer Woodard, and turned himself into police.

Conclusion

This Suit Never Had Merit, and Plaintiffs Always Knew It.

No honest person who reviews the evidence in this case can plausibly claim to believe the Plaintiffs' story, Plaintiffs and Plaintiffs' counsel, least of all. The entire thing always was a sham, and the entire narrative was deceptively and intentionally crafted, well prior to any of the Defendants even arriving in the city.

Plaintiffs' counsel, knowing that a trial will inevitably expose this fraud, have sought to make the process as painful, expensive, time consuming, humiliating, and intrusive as possible, culminating in the recent motion to enjoin Defendant Cantwell.

But before they did that, as the Jewish Telegraphic Agency put it in the article about Kaplan's Interview, "Kaplan's team has obtained reams of information" on their opponents and critics, which will surely come in handy for decades to come.

Plaintiffs and Plaintiffs' counsel could not possibly have believed certain aspects of their own complaint when they filed it. Other aspects they might have genuinely convinced themselves of out of sheer ideological bias, without evidence, which is still negligent at best. Their well-financed investigation, and profoundly intrusive discovery, surely dissuaded them by now from any good faith errors made in the beginning.

Rather than admit their errors, and free the targets of their enmity from this abuse of our Courts, they have doubled down, and sought motions for no other purpose than to salt wounds and twist blades.

Their malice is on display throughout the complaint and subsequent motions. Describing Defendants as "vile" and "obscene". Placing "rally" and "security" and "secret" and "defense" in quotations throughout, as though Defendants could not conceivably have a rally, or be entitled to security, secrets, or self defense. All that's missing is marking up "rights" in the same fashion, which one might suspect proved tempting for Plaintiffs.

In their minds, which are so overcome with certainty of their own moral superiority, there can be no legitimacy to the "other side". While Defendants describe themselves as "White Nationalists" or "National Socialists" or "Pro-White" or "Alt Right", Plaintiffs insist on the more inflammatory terms "White Supremacist" and "neo-Nazi" and "Klansmen", using all such epithets interchangeably, and baselessly inserting "violent" and "hate" as adjectives throughout.

As far as Plaintiffs are concerned, there are only people who agree with them, and criminals who must be punished. Literally. This bias is replete, not only throughout this abuse of our Courts, but throughout all of our political discourse today. The President of the United States said there were "fine

people on both sides" that weekend, and Plaintiffs, like too many others, insist this is impossible.

So far as Plaintiffs are concerned, they are the good, kind, decent folks, even the violent criminals they conspire with. The "other side" are violent criminals, even those who only speak their mind in disagreement with the fundamentalist religion of egalitarianism, which Plaintiffs take as Gospel.

This must be repaired. Not only in this matter, but in our country, or not only will our society unravel, it will be set against itself in mortal enmity. That could well result in a conflict where the survivors are not the most fortunate ones, as has been seen more than a few times throughout Man's tragic history.

Plaintiffs and their counsel would be well served to contemplate the long term ramifications of this. Their grip on power, it was shown in 2016, is not so absolute as they would like to think, and they'll have stop blaming Russia, at some point. Their desperate actions in this and other matters, show that they recognize the possibility of folks like Defendant Cantwell getting in proximity to power.

When Plaintiffs become "the other side," they will certainly hope Defendants recognize that "the other side" has "rights", and treat them, better than they treated us.

DEFENDANT'S PRAYER FOR RELIEF

WHEREFORE, the premises considered, Defendant Cantwell requests the following relief:

- a. This Court deny Plaintiffs' motion for evidentiary sanctions.
- b. Entry of a judgment in favor of Defendants against each Plaintiff and dismissal of the Second Amended Complaint with prejudice;
- c. An award of all costs; and
- d. An award of such other or further relief as this Court might deem just and proper.

Respectfully submitted,

Christopher Cantwell January 18th 2020

